

To: Chapman, Apple[Chapman.Apple@epa.gov]; Brooks, Phillip[Brooks.Phillip@epa.gov]; Parrish, Robert[Parrish.Robert@epa.gov]; Foley, Patrick[Foley.Patrick@epa.gov]
Cc: Fried, Gregory[Fried.Gregory@epa.gov]
From: Dykes, Teresa
Sent: Fri 2/23/2018 7:47:32 PM
Subject: RE: Latest draft of "Project Emissions Accounting" (Project Netting) Guidance memo for a quick heartburn review and FYI
Draft Project Netting Guidance Memorandum 022318- TED.docx

Just seeing this. Pat and Rob- I have inserted some comments on the draft. Please let me know if you have others.

Terri Dykes

Senior Attorney

Office of Enforcement and Compliance Assurance

1200 Pennsylvania Ave. NW

Washington, DC 20460

202.564.9883

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From: Chapman, Apple
Sent: Friday, February 23, 2018 1:54 PM
To: Brooks, Phillip <Brooks.Phillip@epa.gov>; Parrish, Robert <Parrish.Robert@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>
Cc: Fried, Gregory <Fried.Gregory@epa.gov>; Dykes, Teresa <Dykes.Teresa@epa.gov>
Subject: RE: Latest draft of "Project Emissions Accounting" (Project Netting) Guidance memo for a quick heartburn review and FYI

Teri is reviewing now (she is our POC on NSR reform part 2). She is going to put together a draft email for Patrick that provides a summary of this memo, and any enforcement concerns. If you have thoughts please also share them with Teri. Thanks.

Ms. Apple Chapman |Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW, Washington DC, 20004 |202-564-5666 (office)|202-841-6076 (mobile)|

From: Brooks, Phillip

Sent: Friday, February 23, 2018 1:20 PM

To: Parrish, Robert <Parrish.Robert@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>

Cc: Fried, Gregory <Fried.Gregory@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>

Subject: Fwd: Latest draft of "Project Emissions Accounting" (Project Netting) Guidance memo for a quick heartburn review and FYI

Thoughts?

Sent from my iPhone

Begin forwarded message:

From: "Chapman, Apple" <Chapman.Apple@epa.gov>

Date: February 23, 2018 at 1:04:46 PM EST

To: "Dykes, Teresa" <Dykes.Teresa@epa.gov>, "Fried, Gregory"

<Fried.Gregory@epa.gov>, "Brooks, Phillip" <Brooks.Phillip@epa.gov>

Subject: Fwd: Latest draft of "Project Emissions Accounting" (Project Netting)
Guidance memo for a quick heartburn review and FYI

Sent from my iPhone

Begin forwarded message:

From: "Magee, Melanie" <Magee.Melanie@epa.gov>

Date: February 23, 2018 at 1:03:51 PM EST

To: "Chapman, Apple" <Chapman.Apple@epa.gov>, "Doster, Brian"

<Doster.Brian@epa.gov>, "Krallman, John" <krallman.john@epa.gov>

Subject: FW: Latest draft of "Project Emissions Accounting" (Project Netting)
Guidance memo for a quick heartburn review and FYI

Sorry, I should have added you to the email below. Please see Raj's email below.

Thanks

From: Magee, Melanie

Sent: Friday, February 23, 2018 11:29 AM

To: Bird, Patrick <Bird.Patrick@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>; Campbell, Dave <campbell.dave@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; 'Chan, Suilin' <chan.suilin@epa.gov>; Dahl, Donald <dahl.donald@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Davis, Scott <Davis.ScottR@epa.gov>; duke, gerallyn <duke.gerallyn@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Knodel, Jon <Knodel.Jon@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Mooney, John <Mooney.John@epa.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Smith, Mark A. <Smith.Marka@epa.gov>; Werner, Leslye <Werner.Leslye@epa.gov>

Cc: Bray, Dave <Bray.Dave@epa.gov>; Montanez, Jessica <Montanez.Jessica@epa.gov>; Keller, Peter <keller.peter@epa.gov>; Svendsgaard, Dave <Svendsgaard.Dave@epa.gov>

Subject: FW: Latest draft of "Project Emissions Accounting" (Project Netting) Guidance memo for a quick heartburn review and FYI

Importance: High

All, Please see Raj's email below. Review responses are requested by COB 2/26/18.
Thanks

From: Rao, Raj

Sent: Friday, February 23, 2018 11:25 AM

To: Magee, Melanie <Magee.Melanie@epa.gov>

Cc: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Keller, Peter <keller.peter@epa.gov>; Doster, Brian <Doster.Brian@epa.gov>; Krallman, John <krallman.john@epa.gov>

Subject: Latest draft of "Project Emissions Accounting" (Project Netting) Guidance memo for a quick heartburn review and FYI

Importance: High

Melanie,

Please forward this to the permit APMs (and one senior staff, in case the APM is out). Please also include Apple Chapman (OECA).

APMs,

Please find attached the latest draft of the “Project Emissions Accounting” memo with input from OAR. This expands the scope of the earlier draft and clarifies that our existing regulations allow for accounting of emissions decreases at Step 1 for all types of projects.

Again, please note that we are not looking for any line edits – but would like you to flag any heart burn concerns or disconnects. This is a short document and is moving on a fast track and hence we are asking for your input by **cob 2/26/18**. I do want to flag that we expect FN 12 to be clarified to reflect that R2 transmitted EPA’s views. Please ensure that you copy all cc’s in your response.

Thanks

Raj

Raj Rao, P.E.
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Air Quality Policy Division,
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